

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN

IN RE:

Saengla Salykhom
Robert Noy Salykhom
Debtor(s)

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CASE NO. 16-05463
HON. James W. Boyd

MOTION TO REDUCE TIME FOR NOTICE OF MOTION TO INCUR DEBT

Debtors, Saengla and Robert Salykhom move this Court to reduce the time for Notice of the Motion to Incur Debt from twenty-one (21) days to eleven (11) days pursuant to Bankruptcy Rules 2002(a)(2), 9006(c), and LBR 9013(i). In support of their request the debtors state the following:

1. This Chapter 13 case was filed on 10/27/2016 and was subsequently confirmed on 8/21/2017.
1. The Debtors' have been renting their principal residence and has decided to list the property for sale after the Debtors' lease expires on 10/31/2021.
2. The Debtors have found a home they wish to purchase, and have been approved to obtain a mortgage for up to \$225,000.00.
3. The terms of the mortgage loan are contained in the Debtors' Motion to Incur Debt which was filed with this court. [DN83].
4. A reduction in notice time to creditors and other parties in interest to ten (11) days is necessary because the terms of the loan pre-approval expire on 10/27/2021. If the Debtors are unable to reduce the notice period they may lose the home and their approval for a mortgage and be stuck without a place to live.
5. The Motion neither affects plan feasibility, nor does it change the treatment of any creditors. Should any plan amendments be necessary as a result of purchasing the home, such amendments will be filed separately and served under the traditional notice and opportunity period.

WHEREFORE, the Debtors respectfully request that this Court enter the attached Order Shortening Notice Period.

Dated: 10/14/2021

/s/Jeffrey D. Mapes
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